

EXHIBIT A



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October 23, 2019

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mobile Home Park Investments, Inc.
3000 Scott St.,
Des Plaines, IL 60018

Byrnes Mill Properties, LLC
c/o Registered Agent
CSC Lawyers Incorporating Service, Co.
221 Bolivar Street
Jefferson City, MO 65101

D&L Company Agents, Inc.
Registered Agent for
Mobile Home Park Investments, Inc.
216 Higgins Rd. (JJR)
Park Ridge, IL 60068

Re: NOTICE OF INTENT TO FILE SUIT FOR VIOLATIONS OF THE FEDERAL CLEAN WATER ACT

This letter is written on behalf of Missouri Confluence Waterkeeper and its members (collectively “MCW”). Pursuant to Section 505(a) of the Federal Water Pollution Control Act (“CWA”), 33 U.S.C. § 1365(a), MCW intends to file a citizen suit in federal court against Mobile Home Park Investments, Inc. (“MHPI”) and Byrnes Mill Properties LLC (“BMP”) (collectively referred to as (“MPHI/BMP”), for violations of Sections 301(a) and 402(a) of the Clean Water Act, 33 U.S.C. §§ 1311(a) and 1342(a) at the Byrnes Mill Mobile Home Park. This letter satisfies the pre-suit notice requirements of 33 U.S.C. § 1365(b)(1)(A). On the basis of the facts and law explained below, MCW intends to file suit in federal court against MPHI and BMP sixty (60) days from the date of this notice.

MHPI and BMP own and/or operate a facility located at 6856 River Creek Court, House Springs, MO 63051 (“the Facility”). The Facility discharges a variety of pollutants into a tributary of Big River approximately 0.14 miles from the Big River. Dischargers of domestic

60-Day Notice Letter to MHPI/BMP
October 23, 2019

wastewater must comply with National Pollutant Discharge Elimination System (“NPDES”) permits issued under Section 402 of the Clean Water Act, 33 U.S.C. § 1342. A NPDES permit contains limits on the amount of allowable pollutants and contains pollutant-monitoring requirements. The discharge of any pollutant in violation of a NPDES permit is prohibited under Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a), and such permit violations may be enforced by citizens under 33 U.S.C. §§ 1365(a), (f)(6). The Facility’s discharges are subject to NPDES Permit No. MO-0105856 (“NPDES Permit”) issued by the Missouri Department of Natural Resources (“MDNR”).¹

MCW is aware of the Facility’s long history of significant compliance issues. Based on available information, MCW believes and will allege that MHPI/BMP has consistently violated, is currently violating, and will continue to violate the effluent limitations and other conditions contained in its NPDES Permit in violation of Sections 301(a) and 402(a) of the CWA, 33 U.S.C. §§ 1311(a) and 1342(a). Discharge monitoring reports (“DMRs”) and related documents that MHPI/BMP has filed with MDNR show that since at least October 2014, MHPI/BMP has consistently discharged pollutants from the Facility—including E. coli, Ammonia, and Biological Oxygen Demand—into the tributary to the Big River and the Big River in concentrations and amounts that exceed effluent limitations contained in Section A of its NPDES Permit. These same documents also show that MHPI/BMP has regularly failed to conduct the monitoring required in Section A of the NPDES Permit for various pollutants and parameters, and/or failed to report the results of the required monitoring to MDNR.

MCW is a 501(c)(3) non-profit organization, dedicated to protecting and restoring Missouri’s waterways, including protecting Missouri’s waterways from domestic waste pollution such as that discharged by the Facility into the Big River and its tributaries. MCW has members that live, work, and recreate in and around the Big River in the vicinity of the Facility, including areas affected by the violations of the CWA described in this notice letter. MCW and its members are reasonably concerned that the pollutant discharges described herein contribute to degrading the water quality of the Big River, present threats to public health, and diminish use and enjoyment of those waters and the aquatic-dependent wildlife and ecosystems they support. These concerns are significantly heightened in this situation because MHPI/BMP is discharging significant and illegal amounts of E. coli and Ammonia into the Big River which threatens attainment of its designated uses, primarily whole-body recreation and protection of aquatic life.

¹ The Facility’s current NPDES Permit became effective on September 1, 2017 and expires on August 31, 2022. However, several of the violations alleged herein occurred under the prior version of Permit No. MO-0120910. These permits contain similar effluent limitations for E. coli, Ammonia, and Biological Oxygen Demand. The exception being that the facility’s Ammonia limits have become more stringent under the current permit. Because the effluent limits in the current and prior permits are substantially the same (or more stringent), the compliance issues over the last five years discussed herein remain unresolved under the current permit. Thus, when this notice letter refers to the “NPDES Permit” it is referring to both the prior version of Permit No. MO-0105856 and the current version of Permit No. MO-0105856, unless expressly stated otherwise.

60-Day Notice Letter to MHPI/BMP
October 23, 2019

The lawsuit will allege that the acts and omissions described below violate Sections 301(a) and 402(a) of the CWA, 33 U.S.C. §§ 1311(a) and 1342(a), and their implementing regulations, which prohibit discharges in violation of a NPDES permit. MCW alleges that MHPI and BMP are responsible and liable for the violations described in this notice letter. In addition to violating the CWA, the lawsuit also will allege that MHPI/BMP's failure to comply with its NPDES Permit also violates Missouri state law, including but not limited to Missouri's Clean Water Law, § 644.011 Revised Statutes of Missouri, *et seq.*

Through this action, MCW intends to secure appropriate relief for violations of the CWA that have occurred at the Facility during the five years previous to the date of this notice letter and for any similar violations that occur after the date of this notice letter. In particular, MCW plans to seek injunctive and declaratory relief under Section 505(a) and (d) of the CWA, 33 U.S.C. §§ 1365(a) and (d), to prevent further violations and impairment of the Big River and its tributary. Additionally, MCW intends to seek civil penalties for each of the violations described below. Section 309(d) of the CWA, 33 U.S.C. § 1319(d), as adjusted by 40 C.F.R. § 19.4, provides for penalties of up to \$37,500 per day for each violation before November 2, 2015 and up to \$53,484 per violation per day that occurred after November 2, 2015 for each violation discussed below. 40 C.F.R. § 19.4 tbls. 1, 2. In addition to seeking maximum civil penalties, MCW also intends to seek attorney fees and costs as prevailing parties are authorized to do under the CWA, 33 U.S.C. § 1365(d), and such other relief as is permitted by law.

The information below comes from DMRs and other documents contained in MDNR's files for the Facility. MHPI/BMP should consult these documents regarding any question pertaining to the violations referenced in this notice. Information currently in MHPI/BMP's possession may reveal additional violations, including monitoring, reporting, and recordkeeping violations of the CWA.

I. Violations of Effluent Limitations

The Facility's NPDES Permit requires it to monitor and report its discharges for particular pollutants on a monthly basis. *See* NPDES Permit, Section A. Table 1, attached, lists all dates currently known to MCW to a reasonable degree of certainty, from October 2014 through August, 2019 (the most recent month for which MCW has information), on which MHPI/BMP exceeded the effluent limitations in its NPDES Permit. Each exceedance constitutes a violation of the Facility's NPDES Permit, CWA Sections 301(a) and 402(a), and the Missouri Clean Water Law. At a minimum, the lawsuit will involve violations based on the Facility's own samples, as reported in the Facility's DMRs and in Table 1 of this notice letter.

Notably, of the 104 violations listed in Table 1, 58 of them are violations of the monthly effluent limitations in the Facility's NPDES Permit. A violation of a monthly effluent limitation is treated as a violation of that particular parameter for every day of that month. As such, this lawsuit will treat a violation of the Facility's monthly effluent limitation for a particular parameter as the Facility being in violation of its effluent limitation for that particular parameter for every day during that respective month.

60-Day Notice Letter to MHPI/BMP
October 23, 2019

II. Violations of Monitoring and Reporting Requirements

The Facility is required to monitor the parameters that it is authorized to discharge on various frequencies, such as weekly, monthly and quarterly, and to report the results of the monitoring to MDNR on a monthly basis (for weekly and monthly monitoring) or a quarterly basis (for quarterly monitoring). *See* NPDES Permit, at Section A; *see also* NPDES Permit, Section B, Standard Conditions Part I, Section A. Based on these reports submitted by MHPI/BMP to MDNR, Table 2 lists all instances currently known to MCW to a reasonable degree of certainty, from October 2014 through August 2019 (the most recent month for which MCW has information), for which MHPI/BMP failed to comply with the monitoring and reporting requirements of its NPDES Permit. At a minimum, the lawsuit will involve the monitoring and reporting violations contained herein, although MCW expects information and documents currently in MHPI/BMP's possession may reveal additional violations of this type.

III. Violations of Reporting Requirements for Instances of Noncompliance

NPDES permit requires that the Facility notify MDNR of certain instances of noncompliance. Specifically, the Permit provides that:

The permittee shall report any noncompliance which may endanger health or the environment. Relevant information shall be provided orally or via the current electronic method approved by the Department, within 24 hours from the time the permittee becomes aware of the circumstances, and shall be reported to the appropriate Regional Office during normal business hours or the Environmental Emergency Response hotline at 573-634-2436 outside of normal business hours. A written submission shall also be provided within five (5) business days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

NPDES Permit, Section B, Standard Conditions Part I, Section B(2). Based on the information available to MCW at the time of this notice letter, MHPI/BMP did not comply with this reporting requirement for any of the violations listed in Table 1, several of which, given the extremely high concentration of E. Coli, would have endangered health or the environment or given the extremely high concentration of ammonia, would have endangered aquatic life. MCW intends to file suit against MHPI/BMP to enforce each of these violations.

IV. Violation of Requirement to Properly Operate and Maintain

MHPI/BMP's NPDES permit requires that it properly operate and maintain the Facility to comply with the Missouri Clean Water Law and applicable permit conditions, including the effluent limitations set out in Section A of the Facility's NPDES Permit. *See* NPDES Permit,

60-Day Notice Letter to MHPI/BMP
October 23, 2019

Section B (incorporating Part I Standard Condition, Section D(6), dated August 1, 2014, into the Permit as though fully set forth therein). The fact that the Facility continues to regularly exceed allowable effluent limitations indicates that the Facility is not in compliance with this requirement of the Permit. MCW intends to file suit for each day that the Facility has failed and continues to fail to properly operate and maintain the Facility to ensure compliance with applicable Permit conditions, including each and every day during the time period starting five years prior to the date of this notice letter, through the date of this notice and the duration of the suit.

V. Conclusion

Discharges from MHPI/BMP have consistently violated and continue to violate the CWA and present a direct and substantial threat to the water quality of the Big River and its tributary. The violations identified in this notice letter are based upon the best information currently available to MCW. Due to the chronic and persistent nature of MHPI/BMP's violations, there is more than a reasonable likelihood of ongoing violations in the future and MCW expects that discovery will result in additional information, including information in MHPI/BMP's possession, that may reveal additional CWA violations at the Facility, including monitoring, reporting and recordkeeping violations. This letter covers all such violations occurring within the five years immediately preceding the service of this notice letter to the full extent contemplated by the law.

MCW intends to file suit against MHPI and BMP in the Eastern District Court of Missouri to secure appropriate relief under federal and state law for these violations, and for any similar violations that occur after the date of this notice letter. In doing so, MCW seeks to improve the water quality of Missouri's waters surrounding the Facility by securing MHPI/BMP's long-term compliance with its NPDES Permit and applicable laws. MCW believes that the number and frequency of violations over a lengthy period of time indicate systemic and ongoing pollution control problems. If, however, MHPI/BMP can demonstrate during the notice period that it has taken the necessary steps to eliminate all root causes of any of the relevant violations (such as connecting to a regional sewer system), MCW will not pursue claims with regard to those violations. Please be aware, however, that MCW will take the absence of such a showing as an indication that the relevant violations are ongoing.

All pollutant permit limits described herein are contained in the Facility's NPDES Permit. Data regarding violations primarily came from DMRs submitted by the facility to MDNR. If MHPI/BMP believes any information in this notice is inaccurate, MCW encourages MHPI/BMP to bring this to our attention as soon as possible.

If, during the 60-day notice period, representatives of MHPI/BMP wish to discuss any aspect of this notice or explore options for resolving the issues described, please contact the undersigned. Moreover, the 60-day notice period would be the appropriate time for MHPI/BMP to inform MCW of any steps it has already taken to remedy the violations discussed in this notice. Because MCW does not presently intend to delay the filing of a complaint past the end of the 60-day period—even if settlement negotiations are in progress at that time—any interest in such discussions should be communicated at your earliest possible convenience.

60-Day Notice Letter to MHPI/BMP
October 23, 2019

Sincerely,



Robert H. Menees
Attorney for Missouri Confluence Waterkeeper

PERSONS GIVING NOTICE AND REPRESENTING ATTORNEYS

The full name, address, and telephone number of the party providing this notice is:

Missouri Confluence Waterkeeper
c/o Rachel Bartels
121 W. Adams Ave.
St. Louis, MO 63122
(314) 884-1473
rachel@mowaterkeeper.org

The attorneys representing Missouri Confluence Waterkeeper in this matter are:

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Great Rivers Environmental Law Center
319 No. Fourth St., Suite 800
St. Louis, MO 63102
Tel: (314) 231-4181
Email: bobmenees@greatriverslaw.org

COPIES, VIA CERTIFIED MAIL/RETURN RECEIPT REQUESTED, TO:

Jim Gulliford, Regional Administrator
US EPA Region 7
11201 Renner Blvd.
Mail Code: RGADIO
Lenexa, KS 66219

Andrew Wheeler, Administrator
Environmental Protection Agency
Office of the Administrator
1200 Pennsylvania Avenue, N.W.
Mail Code: 1101A
Washington, DC 20460

Carol S. Comer, Director
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

Table 1: Reported Effluent Violations at Byrnes Mill Mobile Home Park

Date	Outfall	Parameter	Effluent Limit	Result
Aug. 2019	1	E. coli	126/100 mL (monthly average)	1,413.6/100 mL
8/31/2019	1	E. coli	630/100 mL (daily maximum)	352/100 mL
Aug. 2019	1	Ammonia	1.4 mg/L (monthly average)	12 mg/L
8/31/2019	1	Ammonia	4.0 mg/L (daily maximum)	12 mg/L
July 2019	1	Ammonia	1.4 mg/L (monthly average)	10.93 mg/L
7/31/2019	1	Ammonia	4.0 mg/L (daily maximum)	12 mg/L
June 2019	1	Ammonia	1.4 mg/L (monthly average)	12 mg/L
6/30/2019	1	Ammonia	4.0 mg/L (daily maximum)	13.09 mg/L
May 2019	1	E. coli	126/100 mL (monthly average)	538.28/100 mL
5/31/2019	1	E. coli	630/100 mL (daily maximum)	870.4/100 mL
May 2019	1	Ammonia	1.4 mg/L (monthly average)	14 mg/L
5/31/2019	1	Ammonia	4.0 mg/L (daily maximum)	14.8 mg/L
April 2019	1	E. coli	126/100 mL (monthly average)	874/100 mL
4/30/2019	1	E. coli	630/100 mL (daily maximum)	2,419.6/100 mL
April 2019	1	Ammonia	1.4 mg/L (monthly average)	15.3 mg/L
4/30/2019	1	Ammonia	4.0 mg/L (daily maximum)	15.3 mg/L
Mar. 2019	1	Ammonia	2.8 mg/L (monthly average)	12 mg/L
3/31/2019	1	Ammonia	8.9 mg/L (daily maximum)	12 mg/L
Feb. 2019	1	Ammonia	2.8 mg/L (monthly average)	14 mg/L
2/28/2019	1	Ammonia	8.9 mg/L (daily maximum)	14 mg/L
Jan. 2019	1	Ammonia	2.8 mg/L (monthly average)	20.4 mg/L
1/31/2019	1	Ammonia	8.9 mg/L (daily maximum)	20.4 mg/L
Dec. 2018	1	Ammonia	2.8 mg/L (monthly average)	12 mg/L
12/31/2018	1	Ammonia	8.9 mg/L (daily maximum)	12 mg/L
Nov. 2018	1	Ammonia	2.8 mg/L (monthly average)	12 mg/L
11/30/18	1	Ammonia	8.9 mg/L (daily maximum)	12 mg/L
Oct. 2018	1	Ammonia	2.8 mg/L (monthly average)	12 mg/L
10/31/2018	1	Ammonia	8.9 mg/L (daily maximum)	12 mg/L
Oct. 2018	1	E. coli	126/100 mL (monthly average)	1558.46/100 mL
10/31/2018	1	E. coli	630/100 mL (daily maximum)	2,419.6/100 mL
Sept. 2018	1	E. coli	126/100 mL (monthly average)	2,419.6/100 mL
9/30/2018	1	E. coli	630/100 mL (daily maximum)	2,419.6/100 mL
Aug. 2018	1	E. coli	126/100 mL (monthly average)	2,419.6/100 mL
8/31/2018	1	E. coli	630/100 mL (daily maximum)	2081/100 mL
Aug. 2018	1	Ammonia	1.4 mg/L (monthly average)	12 mg/L
8/31/2018	1	Ammonia	4.0 mg/L (daily maximum)	12 mg/L
July 2018	1	Ammonia	1.4 mg/L (monthly average)	12.34 mg/L
7/31/2018	1	Ammonia	4.0 mg/L (daily maximum)	12.67 mg/L

60-Day Notice Letter to MHPI/BMP
October 23, 2019

Date	Outfall	Parameter	Effluent Limit	Result
July 2018	1	E. coli	126/100 mL (monthly average)	1790.18/100 mL
7/31/2018	1	E. coli	630/100 mL (daily maximum)	1790.18/100 mL
June 2018	1	E. coli	126/100 mL (monthly average)	469.38/100 mL
6/30/2018	1	E. coli	630/100 mL (daily maximum)	2419.6/100 mL
June 2018	1	Ammonia	1.4 mg/L (monthly average)	12 mg/L
6/30/2018	1	Ammonia	4.0 mg/L (daily maximum)	12 mg/L
May 2018	1	Ammonia	1.4 mg/L (monthly average)	12.5 mg/L
5/31/2018	1	Ammonia	4.0 mg/L (daily maximum)	12.5 mg/L
May 2018	1	E. coli	126/100 mL (monthly average)	564.74/100 mL
5/31/2018	1	E. coli	630/100 mL (daily maximum)	2419.6/100 mL
Apr. 2018	1	Ammonia	1.4 mg/L (monthly average)	14.5 mg/L
4/30/2018	1	Ammonia	4.0 mg/L (daily maximum)	14.5 mg/L
Mar. 2018	1	Ammonia	2.8 mg/L (monthly average)	22.1 mg/L
3/31/2018	1	Ammonia	8.9 mg/L (daily maximum)	22.1 mg/L
Feb. 2018	1	Ammonia	2.8 mg/L (monthly average)	37.2 mg/L
2/28/2018	1	Ammonia	8.9 mg/L (daily maximum)	37.2 mg/L
Feb. 2018	1	BOD	45 mg/L (monthly average)	57 mg/L
Jan. 2018	1	Ammonia	2.8 mg/L (monthly average)	19.3 mg/L
1/31/2018	1	Ammonia	8.9 mg/L (daily maximum)	19.3 mg/L
Jan. 2018	1	BOD	45 mg/L (monthly average)	130 mg/L
1/31/2018	1	BOD	65 mg/L (weekly average)	130 mg/L
Dec. 2017	1	Ammonia	2.8 mg/L (monthly average)	19.3 mg/L
12/31/2017	1	Ammonia	8.9 mg/L (daily maximum)	19.3 mg/L
Dec. 2017	1	BOD	45 mg/L (monthly average)	88 mg/L
12/31/2017	1	BOD	65 mg/L (weekly average)	88 mg/L
Nov. 2017	1	Ammonia	2.8 mg/L (monthly average)	13.2 mg/L
11/30/2017	1	Ammonia	8.9 mg/L (daily maximum)	13.2 mg/L
11/30/2017	1	BOD	45 mg/L (monthly average)	64 mg/L
Oct. 2017	1	E. coli	126/100 mL (monthly average)	188/100 mL
Oct. 2017	1	Ammonia	2.8 mg/L (monthly average)	11.8 mg/L
10/31/2017	1	Ammonia	8.9 mg/L (daily maximum)	11.8 mg/L
Oct. 2017	1	BOD	45 mg/L (monthly average)	68 mg/L
10/31/2017	1	BOD	65 mg/L (weekly average)	68 mg/L
Sept. 2017	1	Ammonia	1.4 mg/L (monthly average)	7.83 mg/L
9/30/2017	1	Ammonia	4.0 mg/L (daily maximum)	7.83 mg/L
Sept. 2017	1	BOD	45 mg/L (monthly average)	46 mg/L
Aug. 2017	1	Ammonia	1.4 mg/L (monthly average)	14.2 mg/L
8/31/2017	1	Ammonia	5.4 mg/L (daily maximum)	14.2 mg/L
July 2017	1	Ammonia	1.4 mg/L (monthly average)	4.9 mg/L
June 2017	1	Ammonia	1.4 mg/L (monthly average)	21.8 mg/L

60-Day Notice Letter to MHPI/BMP
October 23, 2019

Date	Outfall	Parameter	Effluent Limit	Result
6/30/2017	1	Ammonia	5.4 mg/L (daily maximum)	21.8 mg/L
June 2017	1	E. coli	126/100 mL (monthly average)	190/100 mL
May 2017	1	Ammonia	1.4 mg/L (monthly average)	1.96 mg/L
Apr. 2017	1	Ammonia	1.4 mg/L (monthly average)	6.67 mg/L
4/30/2017	1	Ammonia	5.4 mg/L (daily maximum)	6.67 mg/L
Mar. 2017	1	Ammonia	2.7 mg/L (monthly average)	10.3 mg/L
Jan. 2017	1	Ammonia	2.7 mg/L (monthly average)	13.1 mg/L
1/31/2017	1	Ammonia	11.1 mg/L (daily maximum)	13.1 mg/L
Dec. 2016	1	Ammonia	2.7 mg/L (monthly average)	6.5 mg/L
Nov. 2016	1	Ammonia	2.7 mg/L (monthly average)	6.03 mg/L
Oct. 2016	1	E. coli	126/100 mL (monthly average)	296/100 mL
Aug. 2016	1	Ammonia	1.4 mg/L (monthly average)	6.34 mg/L
July 2016	1	Ammonia	1.4 mg/L (monthly average)	12.6 mg/L
7/31/2016	1	Ammonia	5.4 mg/L (daily maximum)	12.6 mg/L
June 2016	1	Ammonia	1.4 mg/L (monthly average)	8.9 mg/L
6/30/2016	1	Ammonia	5.4 mg/L (daily maximum)	8.9 mg/L
Dec. 2015	1	Ammonia	2.7 mg/L (monthly average)	23.6 mg/L
12/31/2015	1	Ammonia	11.1 mg/L (daily maximum)	23.6 mg/L
Nov. 2015	1	Ammonia	2.7 mg/L (monthly average)	31.7 mg/L
11/30/2015	1	Ammonia	11.1 mg/L (daily maximum)	31.7 mg/L
Oct. 2015	1	Ammonia	2.7 mg/L (monthly average)	31 mg/L
10/31/2015	1	Ammonia	11.1 mg/L (daily maximum)	31 mg/L
Sept. 2015	1	Ammonia	2.7 mg/L (monthly average)	12.1 mg/L
9/30/2015	1	Ammonia	11.1 mg/L (daily maximum)	12.1 mg/L
Aug. 2015	1	Ammonia	1.4 mg/L (monthly average)	7.03 mg/L
8/31/2016	1	Ammonia	5.4 mg/L (daily maximum)	7.03 mg/L

Table 2: Reporting Violations

Month	Outfall(s)	Parameter
July 2019	1	BOD
July 2019	1	E. coli
July 2019	1	Flow
July 2019	1	Ammonia
July 2019	1	pH
July 2019	1	TSS*
Jan. 2019	1	BOD
Jan. 2019	1	TSS*
Jan. 2019	1	pH
Jan. 2019	1	Ammonia

Month	Outfall(s)	Parameter
Jan. 2019	1	Flow
Nov. 2018	1	BOD
Nov. 2018	1	TSS*
Nov. 2018	1	pH
Nov. 2018	1	Ammonia
Nov. 2018	1	Flow
Sept. 2017	1	Flow
July 2017	1	Flow
Mar. 2015	1	Flow

TSS= Total Suspended Solids